REMARKS

The present application was filed on March 31, 2004 with claims 1-18, all of which remain pending. Claims 1, 15 and 18 are the independent claims.

In the present Office Action, the Examiner rejected claims 1-9 and 14-18 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,405,162 to Segond et al. (hereinafter "Segond"). Claims 10-13 were indicated as containing allowable subject matter.

Applicants respectfully request reconsideration of the present application in view of the amendments above and remarks below. As discussed below, independent claims 1, 15 and 18 have been amended without prejudice solely to clarify the claimed subject matter. Corresponding amendments have also been made to dependent claims 5-9. Allowable claims 10 and 12 have been rewritten in independent form.

With respect to the §102(b) rejection, Applicants initially note that MPEP §2131 specifies that a given claim is anticipated "only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference," citing <u>Verdegaal Bros. v. Union Oil Co. of California</u>, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Moreover, MPEP §2131 indicates that the cited reference must show the "identical invention . . . in as complete detail as is contained in the . . . claim," citing <u>Richardson v. Suzuki Motor Co.</u>, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Claim 1, as amended, recites a method of processing a communication in a communication system, the method comprising the steps of generating a plurality of terms by combining at least one word and at least one word class; identifying a plurality of words contained within the communication; and processing the plurality of words utilizing a joint classifier configured to determine at least one category for the communication based on application of the plurality of terms to the plurality of words without considering whether a given one of the plurality of terms is a word or a word class. Support for the amendments may be found in the specification at, for example, page 6, lines 14-25; page 7, lines 1-13; page 7, lines 18-23; and page 9, line 13, to page 13, line 22.

Amended claim 1 recites a limitation directed to processing a plurality of words, identified within a communication, utilizing a joint classifier configured to determine at least one <u>category for the communication</u>. As discussed in the specification at, for example, page 6, lines 14-25, in an illustrative embodiment, the determination of a category for the communication may advantageously facilitate the determination of a suitable destination for a given communication, e.g., routing a call to a corresponding destination terminal based on the determined category.

By contrast, Segond is directed to techniques for use in semantically disambiguating a given instance of a word within a text by determining a meaning of an instance of the word. See Segond at, for example, Abstract; column 1, lines 6-10; and column 5, line 46, to column 6, line 5. As such, Segond fails to teach or suggest the limitation of claim 1 directed to determining at least one <u>category</u> for the communication.

Moreover, amended claim 1 recites a limitation directed to generating a plurality of terms by combining at least one word and at least word class. Segond's disclosure that a list of rules may include both <u>word-based rules</u> and <u>class-based rules</u> fails to teach or suggest generating a plurality of terms by combining at least one <u>word</u> and at least one <u>word class</u>. Indeed, Segond actually teaches away by disclosing a technique using two distinct sets of semantic tags respectively based on a dictionary and a semantic ontology. See Segond at, for example, column 9, lines 1-21, and column 10, lines 19-21.

Amended claim 1 recites a further limitation wherein a joint classifier is configured to determine at least one category for the communication based on application of the plurality of terms to the plurality of words without considering whether a given one of the plurality of terms is a word or a word class. Segond not only fails to teach or suggest this limitation, but in fact teaches away by teaching a technique which differentiates between word-based rules and class-based rules. See Segond at, for example, column 3, lines 1-20; column 11, lines 4-15; and column 11, lines 33-64.

Independent claims 15 and 18, as amended, contain limitations similar to independent claim 1 and are thus believed allowable for at least the reasons identified above with regard to claim 1.

Dependent claims 2-9, 16 and 17 are believed allowable for at least the reasons identified above with regard to their respective independent claims. Moreover, one or more of these claims defines independently patentable subject matter.

For example, amended claim 5 recites a limitation wherein one or more of the words and word classes utilized to generate the plurality of terms are selected using information gain based term selection. The Examiner contends that this limitation is taught by Segond at column 3, lines 1-30. Applicants respectfully submit that the relied-upon portion of Segond contains no teachings directed to selection of words and words classes to generate a plurality of terms for use by a joint classifier. Rather, the relied-upon portion of Segond appears directed toward the selection of a rule to disambiguate a semantically ambiguous word. Moreover, the relied-upon portion of Segond fails to teach the use of an information gain based term selection as described with respect to an illustrative embodiment in the present specification at, for example, page 9, line 20, to page 11, line 4.

Amended claim 6 recites a limitation wherein the information gain based term selection determines an information gain value for each of the plurality of terms, the information gain value being indicative of entropy variations over a plurality of possible categories, and being determined as a function of a perplexity computation for an associated classification task. The Examiner argues this limitation is also taught by column 3, lines 1-30 of Segond. Applicants respectfully disagree with the Examiner's contention and respectfully note that the relied-upon portion of Segond fails to even mention either entropy variations or perplexity computations, much less disclose the limitations of claim 6.

Amended claim 7 recites a limitation directed to appending a class corpus to a word corpus. The Examiner argues this limitation is met by column 2, line 57 to column 3, line 10 of Segond. Applicants respectfully disagree. The relied-upon portion of Segond teaches that a detailed corpus such as a dictionary may contain several different types of information from which rules may be obtained. It contains no disclosure directed to appending a class corpus to a word corpus. Rather, as noted above with regard to claim 1, Segond actually teaches away by disclosing a technique using

two distinct sets of semantic tags respectively based on a dictionary and a semantic ontology. See Segond at, for example, column 9, lines 1-21, and column 10, lines 19-21.

In view of the above, Applicants believe that claims 1-18 are in condition for allowance, and respectfully request withdrawal of the §102(b) rejection.

Respectfully submitted,

Date: January 10, 2008

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